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PAGE 1 / 1

This committee responds to the FEC RFAI dated July 16, 2014 with a response due on August 20, 2014 as follows: This committee relied on the FEC's interpretation of the 48-hour independent expenditure reporting requirement as outlined on page 72 of the FEC produced Campaign Guide for Nonconnected Committees under the heading: 'Independent expenditures

aggregating \$10,000 and above.' This paragraph reads in relevant part: 'Once an individual's or committee's independent expenditures in connection with a given election reach or exceed \$10,000 in the aggregate at any time up to and including the 20th day before an election, they must be reported within 48 hours of the date that the expenditure is publicly distributed.' The expenditures in question aggregated above the \$10,000 threshold before the 20th day prior to the election, therefore placing them within the 48 hour reporting period as detailed in this paragraph. Following the FEC's guidance, this committee reported the expenditures properly within 48 hours of public dissemination as explained by the FEC's Campaign Guide for Nonconnected Committees.
